

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Glenda J. Mooneyham, on behalf of herself
and all others similarly situated,

Plaintiff,

v.

Bitcoin Depot, Inc.; Bitcoin Depot Operating,
LLC (d/b/a Bitcoin Depot); Circle K Stores,
Inc.,

Defendants.

Affidavit of Glenda J. Mooneyham

Personally appeared before me, Glenda J. Mooneyham, having first been duly sworn,
who deposes and says that the following is true and correct:

1. I have personal knowledge of the facts set forth in this Affidavit. I am a citizen of the State of South Carolina and am competent to swear to the matter set forth below and do so of my own free will.

2. I am 74 years old. My husband of forty-three years passed away on August 1, 2023. I currently live alone, although my children live nearby.

3. On November 15 and 17, 2023, I was the victim of a scam involving a Bitcoin Depot ATM located at a Circle K in Lexington, South Carolina, in which I deposited \$30,000 into the machine over the course of two transactions.

4. At the time of the scam, I had never heard of Bitcoin and did not know what it was. I still do not understand what Bitcoin is.

5. I am not good with computers and rarely use them. I consider myself technologically illiterate. At the time of the scam, I would use the computer once a week, at most. Since the scam, I do not use computers at all.

6. I am not financially savvy. Over the course of nearly all of my adult life, my husband handled all of our finances. He handled our finances for the 30 years preceding his death.

7. On November 15, 2023, I received a telephone call from someone claiming to work for Wells Fargo's Fraud Department. This person told me that my bank account had been hacked and that someone was transferring money online to a casino in New Mexico. They claimed to be seeing it happen as we were speaking. The individual on the telephone knew my name, social security number, date of birth, address, and the balances in my checking and savings account. That they knew this information convinced me that the person calling me was truly from Wells Fargo's Fraud Department.

8. The individual claiming to be from Wells Fargo's Fraud Department also told me that the Federal Trade Commission was investigating my bank account and sent a letter that appeared to be from the Federal Trade Commission. Ex. __, Letter. I believe I also received text correspondence from a person claiming to be from the FTC.

9. Based on this information, I believed that my bank account had truly been hacked and that I was at an immediate risk of losing the money in the accounts. At the time, I believed the money in the accounts were all of the assets I had.

10. The person I believed to be working in the Wells Fargo Fraud Department told me that the hack may have come from "inside" my local bank, and that the only way to protect my money was to withdraw it and deposit it into a secure Bitcoin wallet the Fraud Department had created for me.

11. I was terrified and believed that I had no other choice than to immediately follow the instructions given to me by the caller claiming to be from the Wells Fargo Fraud Department.

12. I followed the caller's instructions and made two withdrawals of \$15,000, first on November 15, then again on November 17.

13. Then, at the caller's instructions, I took the money to the specific Circle K she told me to go to and, following her instructions, pressed exactly what she told me to press on the Bitcoin Depot ATM. Once I had deposited the money, which took over 45 minutes to complete for each transaction, the person on the telephone sent me a symbol on the telephone and told me to hold it up to the camera on the Bitcoin ATM, and that it would send the Bitcoin to my "secure" Bitcoin wallet.

14. I was terrified during this ordeal and did not read any "terms and conditions" or notice any warning for the Bitcoin ATM. I did not read anything on the screen, I just pressed what the person claiming to be the Wells Fargo Fraud Department told me to, believing that person was helping me to save my money from hackers. At times, I would press the wrong button because my hands were shaking so badly. When I did this, the person on the telephone would become angry and frustrated with me.

15. For the entire time I spent inserting money into the Bitcoin ATM in the Circle K, which took over 45 minutes each visit, Circle K staff was present. At one point, I became so tired from standing, that I pulled a stool from the corner to sit on while I continued to try and insert money into the machine. At no time did anyone from Circle K try to assist me or warn me that the Bitcoin ATM was known to be used to scam people.

16. I did not want to purchase Bitcoin. I just wanted to protect my money from being stolen online. I would never have used a Bitcoin ATM without having been told that my accounts had been hacked and the only way to protect my money was to deposit it all into the Bitcoin ATM.

17. I declare under penalty of perjury, under the laws of the United States of America and the State of South Carolina that the above is true and correct.

AS TO ANYTHING FURTHER, THE AFFIANT SAITH NOT.

Glenda Mooneyham
Glenda Mooneyham

Sworn to and signed before me

This 26 day of June, 2024

Peggy A. Way (seal)

Notary Public in/for the State of SC.

My Commission Expires: 12-2-25

